

From: Watrsedge@aol.com
Sent: Friday, January 25, 2008 10:51 AM
To: Darton, Terry
Subject: Mirant Plant in Alexandria/Comments

January 25, 2008

Mr. Terry Darton
 Virginia Department of Environmental Quality

Re: Proposed two-stack state operating permit
 for Mirant Potomac River Generating Station

Dear Mr. Darton:

I oppose the proposed stack-merger operating permit for the following reasons:

1. It does not set a properly defined baseline for annual emissions or address the potential emission increases that could result from such a merger. Unless the permit sets a baseline based on the most recent 24 months of operation, the plant must undergo a New Source Review.
2. Stack merger is a prohibited dispersion technique, with inadequate research on potential effects on air quality.
3. The proposed two-stack merger does not include emission limits for PM2.5 or for mercury. These are known risks to public health. Failure to include such limits reveals that DEQ is not fulfilling its mission of protecting the health of the citizens of the Commonwealth. This is especially important given that Northern Virginia is a non-attainment area for PM 2.5.
4. PM 2.5 modeling methodology is now available, making Virginia DEQ's continued use of PM10 data as a surrogate for PM 2.5 outdated. You need to institute strict emission limits and require pollution controls to minimize the emission of these tiny breathable particles that can have such dire effects on public health and the environment.
5. You must require baghouses to adequately control PM 2.5 emissions and achieve NAAQS compliance. Existing technology is outdated. This old plant must update and install state-of-the-art technology.
6. The limits set in this proposed SOP are too high and allow emission increases. The proposed limits for coal sulfur content, short-term sulfur dioxide emissions and particulate matter are all higher than they have been in the past or are now. The nitrogen oxide limits are higher than they will be allowed under the CAIR rule which will take effect in 2009, i.e., less than one year after the issuance of this SOP. The CAIR limits must be stipulated in the SOP.
7. Given that last September Virginia announced efforts to reduce Virginia's carbon emissions by 30 percent by 2025, it is shameful to continue to allow Mirant to continue to under-report its CO emissions.
8. The opacity limit of 20 percent is based on antiquated standards and is not protective of public health. Instead, a limit of no more than 10 percent opacity must be required.
9. DEQ should require Mirant to install continuous emission monitors (CEMS) for particulate matter and for CO immediately. The technology is available and already in use elsewhere in the US, including at facilities with coal-fired boilers.
10. The plant should operate using best available pollution control technology at all times.
11. The use of an alternate sorbent for SO2 control must not be authorized without adequate testing of the effects on air quality, particularly small-particle emissions.
12. The SOP must include defined methods of tracking and enforcing compliance. All data related

to monitoring, testing, and enforcement must be readily available to the public without the need for FOIA requests.

Thank you for your attention to our concerns.

Sincerely,

Christa Watters

Member: Northern Virginia Clean Air Coalition, Sierra Club, North Old Town Independent Citizens, Old Town North Community Partnership, Appalachian Mountain Club DC Chapter Conservation Committee

Christa Watters

WattersEdge, Writing/Editing
1186 North Pitt Street
Alexandria, VA 22314
Tel. 703-549-6167
E-mail: wattrsedge@aol.com

Who's never won? [Biggest Grammy Award surprises of all time on AOL Music.](#)